

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 23-CV-80232-ROSENBERG/REINHART

MANIRAJ ASHIRWAD GNANARAJ,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,
-v.-

LILIUM N.V. F/K/A QELL ACQUISITION
CORP. *et al.*,

Defendants.

DEFENDANTS' REQUEST FOR ENTRY OF JUDGMENT

Defendants Lilium N.V. f/k/a Qell Acquisition Corp., Barry Engle, Daniel Wiegand, Geoffrey Richardson, Yves Yemsi, and Alastair McIntosh, (“Defendants”) hereby respectfully submit this Request for Entry of Judgment pursuant to Federal Rule of Civil Procedure 58(d) as follows:

1. The Court granted Defendants’ motion to dismiss and dismissed the Second Amended Complaint without leave to amend on August 23, 2024.
2. The order vacated all future dates and ordered the clerk to terminate the matter and close the case.
3. Rule 58(b)(1)(C) provides that judgments shall be issued on orders denying all relief. Under Rule 58(a), such judgments shall be set out in a separate document.
4. Pursuant to Rule 58(d), and to avoid any lack of clarity, Defendants respectfully request that judgment be entered for Defendants. A proposed judgment is attached hereto.

Dated: September 24, 2024

Respectfully submitted,

/s/ Bradley S. Shraiberg

Bradley S. Shraiberg (Fla. Bar No. 121622)

Patrick Dorsey (Fla. Bar No. 0085841)

SHRAIBERG PAGE P.A.

2385 NW Executive Center Dr Ste 300

Boca Raton, FL 33431-8530

(561) 443-0800

bss@slp.law

pdorsey@slp.law

Boris Feldman

Doru Gavril

FRESHFIELDS BRUCKHAUS DERINGER

US LLP

855 Main Street

Redwood City, CA

Telephone: (650) 618-9250

boris.feldman@freshfields.com

doru.gavril@freshfields.com

Adam Rosenfeld

Susannah Benjamin

FRESHFIELDS BRUCKHAUS DERINGER

US LLP

601 Lexington Ave

New York, NY 10022

Telephone: (212) 277-4000

adam.rosenfeld@freshfields.com

susannah.benjamin@freshfields.com

Attorneys for Defendants